

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com
Sara Jenkins (CA Bar No. 230097)
sarajenkins@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
Teuta Fani (admitted *pro hac vice*)
teutafani@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
Crystal Nix-Hines (Bar No. 326971)
crystalnixhines@quinnemanuel.com
Alyssa G. Olson (CA Bar No. 305705)
alyolson@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Josef Ansorge (admitted *pro hac vice*)
josefansorge@quinnemanuel.com
Xi ("Tracy") Gao (CA Bar No. 326266)
tracygao@quinnemanuel.com
Carl Spilly (admitted *pro hac vice*)
carlspilly@quinnemanuel.com
1300 I Street NW, Suite 900
Washington D.C., 20005
Telephone: (202) 538-8000
Facsimile: (202) 538-8100

Jomaire Crawford (admitted *pro hac vice*)
jomairecrawford@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Jonathan Tse (CA Bar No. 305468)
jonathantse@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Counsel for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of themselves and
all others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JONATHAN TSE IN
SUPPORT OF JOINT SUBMISSION RE:
SEALING PORTIONS OF SPECIAL
MASTER'S REPORT AND
RECOMMENDATIONS ON
REFERRED DISCOVERY ISSUES
(PRESERVATION PLAN) IN
RESPONSE TO DKT. NOS. 524, 525**

Referral: Hon. Susan van Keulen, USMJ

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney at Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I
5 could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of the Parties’
7 Joint Submission Re: Sealing Portions of Special Master’s Report and Recommendations on
8 Referred Discover Plan (Preservation Plan) in Response to Dkt. Nos. 524, 525 (“Order”). In making
9 this request, Google has carefully considered the relevant legal standard and policy considerations
10 outlined in Civil Local Rule 79-5. Google makes this request with the good faith belief that the
11 information sought to be sealed consists of Google’s confidential information and that public
12 disclosure could cause competitive harm.

13 3. Google respectfully requests that the Court seal the redacted portions identified in
14 the Order.

15 4. The information requested to be sealed contains non-public, sensitive confidential
16 business information related to Google’s internal technological systems that could affect Google’s
17 competitive standing and may expose Google to increased security risks if publicly disclosed,
18 including various types of Google’s internal projects, data signals, and logs and their proprietary
19 functionalities, that Google maintains as confidential in the ordinary course of its business and is
20 not generally known to the public or Google’s competitors.

21 5. Such confidential information reveals Google’s internal systems and operations and
22 falls within the protected scope of the Protective Order entered into this action. *See* Dkt. 81 at 2-3.

23 6. Public disclosure of such confidential information could affect Google’s competitive
24 standing as competitors may alter their system designs and practices relating to competing products,
25 time strategic litigation, or otherwise unfairly compete with Google.

26 7. On April 11, 2022, the parties conferred on the proposed redactions to the Order.
27 Plaintiffs take no position on sealing the proposed redactions.

28

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed in San Francisco, California on April 11, 2022.

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

Jonathan Tse

Attorney for Defendant